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COUNTY OF NAPA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GAYLE BROCK,

Plaintiff,

vs.

COUNTY OF NAPA and DOES 1 through 50,
inclusive,

Defendants.

Case No.: CV 11-0257 SBA

STIPULATION EXTENDING DEADLINES
FOR EXPERT DISCLOSURES, EXPERT
DISCOVERY AND DEPOSITION OF
OFFICER SKILLINGS; ORDER

Plaintiff GAYLE BROCK and defendant COUNTY OF NAPA hereby enter into this
Stipulation Extending Deadlines For Expert Disclosures, Expert Discovery And Deposition Of
Officer Skillings with reference to the following facts:

A number of critical depositions have been taken in the last two weeks, and others are
scheduled to be taken on January 27, 30 and 31, 2012. January 31, 2012 is currently both the cutoff
date for non-expert discovery and the deadline for initial expert disclosures. Transcripts of the recent
and upcoming depositions will not be completed in time for the parties' experts to review the
deponents' testimony prior to the current deadline for expert disclosures.

The parties have not been able to schedule the deposition of one percipient witness,
Correctional Officer Kevin Skillings, prior January 31, 2012. Scheduling difficulties have arisen as a
result of Officer Skillings' recent assignment to work the graveyard shift at the Napa County Jail, and
as a result of the attorneys' calendars.

A continuance of the dates for expert disclosures and the expert discovery deadline is needed to allow time for the transcripts of all recent and upcoming depositions to be prepared and made available to the parties' experts for review before those experts and their opinions are disclosed. In addition, a continuance of the non-expert discovery cutoff date is needed for the limited purpose of scheduling the deposition of Officer Skillings. No other continuance of the deadline for non-expert discovery is sought by this Stipulation.

IT IS HEREBY STIPULATED by and between plaintiff GAYLE BROCK and defendant COUNTY OF NAPA, through their attorneys of record, that the dates for expert disclosures, the expert discovery deadline and the non-expert discovery cutoff date shall be continued as follows:

1. The parties shall designate any experts by March 1, 2012;
2. The parties shall disclose any rebuttal experts by March 15, 2012;
3. Expert discovery shall be completed by April 10, 2012; and
4. The cutoff date for non-expert discovery shall be continued through February 17, 2012 for the limited purpose of scheduling the deposition of Officer Kevin Skillings. With respect to all other non-expert discovery, the discovery cutoff date of January 31, 2012 shall remain in effect.

DATED: January 27, 2012

SPAULDING McCULLOUGH & TANSIL LLP
Attorneys for Defendant
COUNTY OF NAPA

By: /s/ Terry S. Sterling
Terry S. Sterling

DATED: January 27, 2012

LAW OFFICE OF JESSE S. TURNER
Attorneys for Plaintiff GAYLE BROCK

By: /s/ Jesse S. Turner
Jesse S. Turner, Esq.

ORDER

IT IS SO ORDERED.

DATED: 1/31/12


UNITED STATES DISTRICT COURT JUDGE